



NORLITE CORPORATION

628 SO. SARATOGA STREET
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PHONE: (518) 235-0401
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January 16, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 01/01/12- 01/13/12
Kiln 2: 01/01/12- 01/13/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 01/01/12 thru 01/13/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the LGF flow monitor. Norlite feels the main reason for the LGF Flow Span Cutoffs is using valves to control for LGF Line Pressure. The Department has approved new piping configuration and valve removal to help improve LGF delivery at the Kilns. Norlite is underway with this project and hopeful the new configuration will improve efficiency. Norlite is also hopeful to have the requirement for LGF Line Pressure reduced or removed completely to further improve LGF flow efficiencies. Norlite will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joeseeph Hadersbeck, NYSDEC – R4w/attachments

DCL: 2375



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
01/01/12 - 01/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/1/2012	1:48:50	1/1/2012	1:49:34	0:00:44	1	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Venturi D.P. Span	Venturi D.P.	Span	Adjusted Venturi D.P.
1/1/2012	5:50:33	1/1/2012	5:51:09	0:00:36	2	Malfunction	Reduced Draft in the Venturi Scrubber Which Caused Overall Reduced Kiln Draft. Kiln 1 Shutdown Occurred on 01/01/12	Front Kiln Pressure, 1 Second Delay	Opl	Shutdown On Kiln To Address Decreased Draft
1/1/2012	5:51:53	1/1/2012	5:52:16	0:00:23	3	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Venturi D.P. Span	Venturi D.P.	Span	Adjusted Venturi D.P.
1/1/2012	8:08:49	1/1/2012	8:09:58	0:01:09	4	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Venturi D.P. Span	Venturi D.P.	Span	Adjusted Venturi D.P.
1/2/2012	2:30:25	1/2/2012	2:31:36	0:01:11	5	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span	Scrubber pH	Span	Adjusted Scrubber pH
1/3/2012	18:12:38	1/3/2012	18:35:18	0:22:40	6	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span / Tank Switch	LGF Flow	Span	Adjusted Fuel Flow
1/3/2012	18:35:50	1/3/2012	18:36:26	0:00:36	7	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/5/2012	17:02:15	1/5/2012	17:02:49	0:00:34	8	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/5/2012	17:05:04	1/5/2012	18:10:04	1:05:00	9	Malfunction	Previous LGF Flow Cutoff Caused System Instability, Which Caused CO's to Rise	Carbon Monoxide	Opl	Adjusted Fuel Flow
1/7/2012	10:35:59	1/7/2012	10:35:59	0:00:00	10	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/7/2012	14:47:32	1/7/2012	14:48:30	0:00:58	11	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/7/2012	20:19:23	1/7/2012	20:20:26	0:01:03	12	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/9/2012	8:40:36	1/9/2012	8:41:23	0:00:47	13	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
01/01/12 - 01/13/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/2/2012	3:20:07	1/2/2012	4:32:28	1:12:21	1	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Venturi D.P. Span/Power Outage	Venturi D.P.	Span	Adjusted Venturi D.P.
1/2/2012	7:24:08	1/2/2012	7:24:35	0:00:27	2	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/2/2012	7:44:54	1/2/2012	7:45:30	0:00:36	3	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/2/2012	7:45:33	1/2/2012	7:45:53	0:00:20	4	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/2/2012	8:15:08	1/2/2012	8:15:31	0:00:23	5	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/4/2012	3:11:05	1/4/2012	3:11:36	0:00:31	6	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/7/2012	3:45:06	1/7/2012	3:45:28	0:00:22	7	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/7/2012	9:44:43	1/7/2012	9:45:30	0:00:47	8	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/7/2012	16:18:33	1/7/2012	16:20:43	0:02:10	9	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/7/2012	22:20:01	1/7/2012	22:33:40	0:13:39	10	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span / Tank Switch	LGF Flow	Span	Adjusted Fuel Flow
1/7/2012	22:34:51	1/7/2012	22:35:34	0:00:43	11	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/9/2012	12:53:27	1/9/2012	12:54:01	0:00:34	12	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/10/2012	16:16:01	1/10/2012	16:16:29	0:00:28	13	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow

1/11/2012	5:07:31	1/11/2012	5:08:50	0:01:19	14	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/11/2012	6:21:00	1/11/2012	6:22:04	0:01:04	15	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Kiln Pressure	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/11/2012	7:01:44	1/11/2012	7:09:59	0:08:15	16	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/11/2012	8:45:10	1/11/2012	9:05:05	0:19:55	17	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/11/2012	9:17:31	1/11/2012	9:27:39	0:10:08	18	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow